

EXHIBIT B

§ 13.11: Complaint for Copyright Infringement

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MiniLabsters LLC (PLAINTIFF),

-against-

Your Little
Scientist
(COMPLAINT)

DEFENDANT CORPORATION AND
DEFENDANT INDIVIDUAL

Plaintiff, by its attorney Julia Larsson, as and for its complaint, alleges:

PARTIES

1. Plaintiff is a corporation organized and existing under the laws of the State of Delaware, with an office and principal place of business at Queens, New York.

2. Defendant is a corporation organized and existing under the laws of the State of New York, with an office and principle place of business at Seventh Avenue, New York.

3. Defendant has at all relevant times been engaged in the business of manufacturing and marketing of science toys.

4. The defendant individual is the owner of the defendant corporation and directly conducts the affairs of the defendant corporation. Both defendant corporation and individual defendant shall be referred to as defendant.

JURISDICTION AND VENUE

5. This action arises under the Copyright Act of 1976, 17 U.S.C. § 101 *et seq.* (the "Copyright Act").

6. Jurisdiction is conferred on this Court pursuant to 28 U.S.C. § 1338, and with respect to claims under state law, by the principles of pendant jurisdiction.

FACTS

7. Plaintiff is a manufacturer and marketer of science equipment for kids which are referred to as "hardware".

8. At significant expense plaintiff has developed, tested and manufactured a portable microscope, hereby referred to as a "Miniscope", which was introduced in November of 2022.

9. All contents on the plaintiffs website (www.minilabsters.com), including both images and text, is custom made. Full ownership belongs to MiniLabsters LLC.

Dated: 26th day of April, 2024

JULIA LARSSON

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